

EXHIBIT A-3

Dr. Dilip Jana

Date: June 9, 2025

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Peter Wahby

Lead Counsel for Walmart Inc.

Greenberg Traurig, LLP

2200 Ross Avenue | Suite 5200 | Dallas, TX 75201

**Re: Discovery Clarification Request Pursuant to Federal Rules of Civil Procedure
26 and 37**

Jana v. Walmart Inc., Case No. 4:24-cv-00698-SDJ-BD

Dear Mr. Wahby:

I write pursuant to Federal Rules of Civil Procedure 26 and 37 to respectfully request clarification regarding the preparation and certification of Defendant Walmart Inc.'s Interrogatory responses served on April 28, 2025, which you signed and certified under Rule 26(g).

On June 3, 2025, Mr. Adrian Milbourne submitted a sworn declaration under penalty of perjury pursuant to 28 U.S.C. § 1746, stating in part:

“I am authorized to make this declaration on behalf of Walmart. I am familiar with and was directly involved in many of the factual circumstances underlying the above-captioned lawsuit... I served as Plaintiff's direct supervisor from April 2023 until his termination... in October 2023.”

As a key fact witness, Mr. Milbourne's declaration confirms that he has personal knowledge of central events and factual issues addressed in multiple Interrogatories. Accordingly, his participation—or lack thereof—in the preparation of Walmart's Interrogatory responses raises critical questions under Rule 26(g).

On May 2, 2025, I wrote to notify you that Walmart's interrogatory responses and document production served April 28, 2025, were incomplete and/or evasive:

"Your response to Written Interrogatories and Production of Documents on April 28, 2025 was incomplete and/or evasive. It's ~**270 days** since the Complaint was filed in the Federal Court, in your response on April 28, 2025, you produced 0 (zero) documents for my Production requests and inserted Objections for almost all Interrogatories despite my efforts for cooperation on April 3, 2025.... your responses are incomplete and/or evasive and it "must be treated as a failure to disclose, answer, or respond""

This includes **Interrogatory No. 1**, which requested (Originally served on March 28, 2025)

"Identify all persons answering or supplying information used in answering these Interrogatories. Please be specific to each individual's contribution to each of the answers of these Interrogatories."

As of June 8, 2025, I have not received any clarification or amended response.

To assess the adequacy of Walmart's certification under Federal Rule of Civil Procedure 26(g) and other applicable Federal Rules, I respectfully request your written confirmation of the following:

1. Did Mr. Adrian Milbourne materially contribute to the preparation, drafting, review, or approval of Walmart's Interrogatory responses served on April 28, 2025?
2. Was Mr. Milbourne aware of the content or substance of Walmart's responses to Interrogatories Nos. 1 through 24, either before or after service?
3. Did you or any member of your legal team — Ms. Morgan Jones or Mr. Holmes Hugh Hampton — consult with Mr. Milbourne (or other Walmart personnel) to obtain factual input for preparing Walmart's Interrogatory responses?
4. Did Ms. Morgan Jones or Mr. Holmes Hugh Hampton materially contribute to the preparation, drafting, review, or approval of Walmart's Interrogatory responses, or were they substantively aware of the content of those responses?

5. Please identify, by name and title, all individuals who provided factual input, reviewed, or approved Walmart's responses to Interrogatories Nos. 1 through 24. For each, please include:
- a. Name
 - b. Title
 - c. Department
 - d. Nature of involvement (e.g., fact witness, legal reviewer, supervisor, HR liaison)
 - e. Which specific Interrogatory(ies) they contributed to

This information is necessary to determine the adequacy of Walmart's certification under Rule 26(g), and whether further motions under different federal statutes are warranted.

If you believe that any of Walmart's prior Interrogatory responses require amendment or supplementation in light of Mr. Milbourne's declaration or the above inquiries, I am open to receiving a written proposal to address those issues.

To facilitate potential resolution without the need for court intervention, please provide your response by 5:00 p.m. Central Time on Wednesday, June 11, 2025.

Sincerely,


Dr. Dilip Jana

Pro Se Plaintiff